UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
SAM NUNN
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA GEORGIA 30303-8960

June 14, 2010

Mr. Mark Kinzer
Acting Chief, Planning and Compliance Division
National Park Service
Southeast Regional Office
Atlanta Federal Center
1924 Building
Alabama St., SW.
Atlanta, Georgia 30303

RE: EPA Review Comments on Final General Management Plan/ Environmental Impact Statement for Tuskegee Airmen National Historic Site FEIS 10-18
CEQ Number: 20100173

Dear Mr. Kinzer:

The U.S. Environmental Protection Agency (U.S. EPA) Region 4 reviewed the subject Final Environmental Impact Statement (FEIS) pursuant to Section 309 of the Clean Air Act, and Section 102 (2)(C) of the National Environmental Policy Act (NEPA). The purpose of this letter is to provide you with EPA's comments.

MANAGEMENT ZONES AND ALTERNATIVES

The FEIS assesses the potential environmental impacts of the management plan for the management and use of the Tuskegee Airman National Historic Site in Alabama. Building blocks for reaching a National Park System approved plan are management zones and alternatives. Five management zones have been identified for Tuskegee Airmen NHS, including: Historic 1945 Zone, Visitor Orientation Zone, Administration Zone, Recreation Zone, and Nature Discovery Zone. Four action alternatives and a no-action alternative are discussed in the FEIS. The alternatives which were discussed in the FEIS consist briefly of: Alternative A) the no-action alternative, Alternative B) emphasizes the natural environment by keeping Tuskegee Airmen NHS largely undeveloped and natural in character outside of the core historic area, Alternative C) aims to restore much of the park to it's historic 1945 appearance, Alternative D) is the National Park Service's (NPS) and the environmentally preferred alternative which offers the most diversity of visitor interpretive programs, recreational opportunities, and preserving cultural resources and Alternative E) which offers the most recreational opportunities.

Alternative D (the Preferred Alternative) is the only alternative to contain all five of the management zones. The Preferred Alternative provides park visitors a strong "stepping back into

time" experience to the war years with a focus on the flight training experience. The proposed improvements to the site would reflect the historic appearance of the site during the year 1945 and the park would provide visitor services compatible with the projected visitor load and composition. Visitation is expected to increase from the current 30,000 people per year to approximately 495,000 annual visitors within the initial five years, based on full build-out of the site, which includes the future Tuskegee Airmen National Center (TANC). Approximately 75 percent of visitors to the proposed facilities would include the future TANC in their visit.

POTENTIAL IMPACTS

Floodplains

Maps depicting the footprint for the Preferred Alternative were overlaid on the floodplain area maps using best professional judgment to identify direct impacts to floodplains. Based on FEMA mapping, three floodplain zones are located in the Tuskegee Airmen NHS. Several activities included in the proposed action will occur or partially occur within the floodplain including vegetation clearing, rehabilitation of the historic pond and plane tie down area, and construction of a storm water detention pond. These are the historic areas of the site therefore rehabilitation must take place on site. Rehabilitating the plane tie-down area is necessary to return the landscape to the period of significance of the Tuskegee Airmen. The plane tie-down area is currently failing impervious surface and this asphalt will be replaced. Construction of a storm water pond in the floodplain would also alter the floodplain; however, it would provide water management functions consistent with the function of floodplains. The storm water detention pond would temporarily detain storm water, preventing it from flooding adjacent areas in the floodplain already prone to flooding during storm events. The vegetation removal and rehabilitation of the historic pond are necessary to rehabilitate the historic landscape. New vegetation appropriate to the historic period of significance would be planted and the area would be maintained as vegetated. No flood storage volume would be lost as a result of these projects. Alternatives to vegetation removal were not considered since the vegetation removal within the 100-year floodplain is necessary to rehabilitate the historic landscape.

Endangered Species

The unnamed tributary affected by the project drains into a segment of Uphapee Creek extending from Alabama Highway 199 upstream to confluence of Opintlocco and Chewacla Creeks, which has been proposed as Critical Habitat (68 FR 14751-14832, March 26, 2003) for the following Federally listed mussel species:

Southern clubshell (Pletroherna decistrm) - Endangered
Finelined pocketbook (Lanzpsilis nltilis) - Threatened
Ovate clubshell (Ple~rrohernpae rovattmt) – Endangered

Based on records, the above listed mussel species still occur downstream of the confluence of the tributary with Uphapee Creek (USFWS 2004). Also, based on records, the project area is within the historic range of the red-cockaded woodpecker (USFWS 1985), however, suitable habitat for this species does not occur within the park (NPS 2004).

SUSTAINABLE ("GREEN") INFORMATION

In the spirit of collaboration and technical assistance the EPA would like to offer some sustainable activities which could be considered in the Tuskegee Airmen NHS project.

Green Building

Green building is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle from design to, construction, operation, maintenance, renovation and deconstruction. This practice expands and complements the classical building design concerns of economy, utility, durability, and comfort. Green building is also known as a sustainable or high performance building.

Green buildings are designed to reduce the overall impact of the built environment on human health and the natural environment by:

- Efficiently using energy, water, and other resources
- Protecting occupant health and improving employee productivity
- Reducing waste, pollution and environmental degradation

For example, green buildings may incorporate sustainable materials in their construction (e.g., reused, recycled-content, or made from renewable resources); create healthy indoor environments with minimal pollutants (e.g., reduced product emissions); and/or feature landscaping that reduces water usage (e.g., by using native plants that survive without extra watering).

Why Build Green? In the United States, buildings account for:

- 39 percent of total energy use
- 12 percent of the total water consumption
- 68 percent of total electricity consumption
- 38 percent of the carbon dioxide emissions

Potential benefits of green building can include:

Environmental benefits

Enhance and protect biodiversity and ecosystems
Improve air and water quality
Reduce waste streams
Conserve and restore natural resources

Economic benefits

Reduce operating costs
Create, expand, and shape markets for green product and services
Improve occupant productivity
Optimize life-cycle economic performance

Social benefits

Enhance occupant comfort and health
Heighten aesthetic qualities
Minimize strain on local infrastructure

For more information on Green Building please visit: http://www.epa.gov/greenbuilding/

Green Parking

Green parking refers to several techniques that applied together reduce the contribution of parking lots to total impervious cover. From a storm water perspective, green parking techniques applied in the right combination can dramatically reduce impervious cover and, consequently, reduce the amount of storm water runoff. Green parking lot techniques include: setting maximums for the number of parking lots created; minimizing the dimensions of parking lot spaces; utilizing alternative pavers in overflow parking areas; using bioretention areas to treat storm water; encouraging shared parking; and providing economic incentives for structured parking.

Green parking lots can dramatically reduce the creation of new impervious cover. How much is reduced depends on the combination of techniques used to achieve the greenest parking lot. While the pollutant removal rates of bioretention areas have not been directly measured, their capability is considered comparable to a dry swale, which removes 91 percent of total suspended solids, 67 percent of total phosphorous, 92 percent of total nitrogen, and 80-90 percent of metals (Claytor and Schueler, 1996).

North Carolina's Fort Bragg vehicle maintenance facility parking lot is an excellent example of the benefits of rethinking parking lot design (NRDC, 1999). The redesign incorporated storm water management features, such as detention basins located within grassed islands, and an onsite drainage system that exploited existing sandy soils. The redesign reduced impervious cover by 40 percent, increased parking by 20 percent, and saved 20 percent or $1.6 million on construction costs over the original, conventional design.

For more information on Green Parking please visit:

http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=factsheet_results&view=specific&bmp=89

Briefly three other sustainable activities which may applicable to the Tuskegee Airmen NHS project are as follows:

- **Green Detention Ponds**
- **Rain Barrels**
- **Rain Gardens**

Information about these three activities can be easily found on the web.

Summary and Recommendations

Alternative D (the Preferred Alternative) implements the use of Best Management Practices (BMPs) required during construction to minimize impacts of pond construction within the floodplain. New vegetation appropriate to the historic period of significance should be planted and the area should be maintained as vegetated. No flood storage volume should be lost as a result of these projects.

As much as possible, secondary construction impacts to floodplain areas and communities should be avoided during the new construction activities, including the clearing of the vegetation within the floodplain, the improvement of impervious surfaces at the plane tie-down area, and excavation of the historic pond. In order to minimize and mitigate the environmental impacts, an erosion and sediment control plan should be prepared and included in the final construction plans, and disturbance of vegetation will be minimized. Mitigation would also include replanting the area disturbed by construction activities with native species. Specifically, the area proposed for vegetation clearing activities will be rehabilitated with vegetation from the cultural landscape of the Tuskegee Airmen NHS during its period of significance.

Regarding Endangered and Threatened Species recommendations for mitigating impacts on these species are as follows:

1. Avoid any major stream alteration if at all possible. As an alternative, develop a comprehensive storm water management plan using measures such as pervious surfacing materials, storm water diversion, retention ponds, and revegetation with trees and natural vegetation, rather than stream alteration for flood control.

2. If stream alteration is absolutely necessary, develop specific best management practices (BMPs) to limit downstream disturbance, particularly sedimentation and turbidity, during and after construction. BMPs should include avoidance of construction activity except during dry, low-water periods; use of a temporary coffer dam and/or siltation fences and us of hay bales. Any dredge spoil or debris should be disposed on an upland site with low erosion potential.

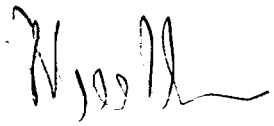
3. Employ techniques to reduce impacts on wildlife, including visitor education programs, restrictions on visitor activities, and park ranger patrols.

4. Implement a natural resource protection program during construction activities. Standard measures would include construction scheduling, biological monitoring, erosion and sediment control.

Regarding Environmental Justice (EJ) – EPA appreciates appropriate consideration and information on low-income (EJ) populations relative to minorities, women or persons with disabilities as not being adversely nor disproportionately impacted by this proposed program. Overall, we believe that outreach to communities is the most direct and reliable method to determine demographics since US Census data often do focus on specific communities and are only compiled every ten years. If data from such surveys is considered too invasive, we suggest that general but substantiated demographic information about the communities be provided to help determine if substantive numbers of minorities and low-income groups are involved.

The scope of this proposed action appears to be within acceptable limits in order to achieve project objectives. Based on the information provided in this document, there appears to be no significant environmental impacts associated with the proposed project alternatives, and we support implementation of the Management Plan. The document received a rating of "LO," (Lack of Objections); that is, we did not identify any potential environmental impacts requiring substantive changes to the proposal. We fully support the NPS effort to preserve this important historic site. Thank you for the opportunity to comment on this project. If we may be of further assistance, please contact me or Ken Clark of my staff at (404) 562-8282.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office